

AUG 01 2012

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

EDWARD D. BOATMAN

)
) No. 12 CR 367
)
) Violation: Title 18, United States
) Code, Section 2113(a)
)

JUDGE ZAGEL

MAGISTRATE JUDGE COX

The SPECIAL SEPTEMBER 2011 GRAND JURY charges:

On or about January 15, 2012, at Stickney, in the Northern District of Illinois, Eastern Division,

EDWARD D. BOATMAN,

defendant herein, did, by intimidation, take from the person and presence of bank employees approximately \$334.50 in United States Currency belonging to and in the care, custody, control, management, and possession of TCF Bank, 7122 West 40th Street, Stickney, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

In violation of Title 18, United States Code, Section 2113(a).

FORFEITURE ALLEGATION

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

1. The allegations contained in Count One are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of the violation of Title 18, United States Code, Section 2113(a), as alleged in the foregoing indictment,

EDWARD D. BOATMAN,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981, any and all right, title, and interest defendant may have in any property, real and personal, which constitutes or is derived from proceeds obtained directly or indirectly from the offense conduct, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. The interests of defendant subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), include but are not limited to at least approximately \$334.50 taken from TCF Bank, 7122 West 40th Street, Stickney, Illinois, on or about January 15, 2012.

4. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;

- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c);

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY